

JOSHUA GARTON,

*Plaintiff,*

V.

W. RAY CROUCH, DAVID RAUSCH,  
BRADLEY NEALON, RUSSELL  
WINKLER, JOSHUA MELTON,  
JOSEPH CRAIG, DONALD ARNOLD,  
ANDREW VALLEE, and  
CITY OF DICKSON, TENNESSEE,

*Defendants.*

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Case No. 3:21-cv-00338

## JURY DEMANDED

**JOINT MOTION OF PLAINTIFF AND TBI DEFENDANTS FOR JUDICIAL  
SETTLEMENT CONFERENCE**

Comes now the Plaintiff, Joshua Garton, and the TBI Defendants (Craig and Vallee), and pursuant to Local Rule 16.04(a)–(b) and the Court’s Initial Case Management Order, *see* Doc. 72 at 4 (“Any party desiring a judicial settlement conference should file an appropriate motion.”), jointly request a judicial settlement conference at the Court’s earliest convenience.

As grounds for this Motion, the movants represent that they have exchanged settlement offers and taken enough discovery to evaluate settlement, and that a judicial settlement conference would be productive before the movants incur additional discovery expenses that are otherwise contemplated between the filing of this motion and the conclusion of the discovery period. Accordingly, the movants respectfully request a judicial settlement conference in the month of July or at the earliest date the Court's

schedule otherwise allows. Defendant Crouch has been consulted regarding this proposal and does not wish to participate in any conference, and the movants are prepared to conduct a conference without his participation, which is unnecessary to potential resolution of the claims between them.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of July, 2023, a copy of the foregoing was transmitted via CM/ECF to:

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By: /s/ Daniel A. Horwitz